

EXHIBIT A

Larson, J.T.

From: André Rouviere <andre@rouvierelawfirm.com>
Sent: Thursday, November 19, 2020 12:08 PM
To: Larson, J.T.; Eaton, Joe; Jodi Rouviere; Asfendis, Paul E.
Subject: [EXTERNAL]Rouviere v Depuy

JT:

In light of the recent disclosure by DePuy of the relationship between Dr. Medlin, DePuy and its counsel, I will request leave of the Court to conduct limited discovery to determine the scope and length of that relationship and nature of any potential conflict as DePuy seeks to bind Plaintiffs to a disqualified expert's opinion concerning DePuy. Obviously DePuy was well aware of its relationship with Dr. Medlin and choose not to disclose this relationship until November 13, 2020. Please advise if you object and if so time to meet and confer today.

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